

REMARKS

INTRODUCTION:

In accordance with the foregoing, claims 1-6, 8-11, 13-17, 19-21, 24, 26-31, 35-37, 39, 41, 43, 45, 47-49, 63, 64, 80-82, 87, 89-92, 96, 97, 100, 105 and 108 have been amended. No claims have been cancelled or added. Support for the amendments and the new claims may be found at least at paragraph [0019], [0020] [0025], [0027], [0028], [0029], [0030], [0034], [0046], and [0047] of the above-identified application and therefore no new matter has been presented.

Claims 1-109 are pending in the present application. Claims 1, 13, 20, 30, 41, 49, 64 and 100 are independent claims. Applicant requests reconsideration and allowance of the present application in view of the present amendments and the following remarks.

REJECTIONS UNDER 35 USC §102 AND §103:

Claims 1-4, 20, 41, 45-48, 80-88 and 100-106 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,904,406 B2 to Yamaji (Yamaji). Claims 13-18, 30-37, 39, 40, 45, 49-56, 59-70, 73-77 and 89-91 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application No. 2003/0192058 A1 by Miyatake (Miyatake). Claims 5, 19, and 38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Miyatake in view of U.S. Patent No. 7,030,930 B2 to Kovacevic (Kovacevic). Claims 6-12, 21-27, 29, 42-44, 79 and 107-109 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamaji in view of Miyatake. Claim 28 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamaji in view of Miyatake, and further In view of Kovacevic. Claims 57, 58, 71, 72, 78 and 92-99 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Miyatake in view of Yamaji. All rejections are respectfully traversed.

Amended independent claim 49 recites at least the following:

A reproducing apparatus directly connected with a storage medium disposed external to the reproducing apparatus, the apparatus comprising:

a receiving processor that receives a digital video signal;

an output unit that outputs the digital video signal; and

a controller that transmits the received digital video signal from the reproducing processor to the external storage medium by way of a

direct connection between the controller and the external storage medium, stores the digital video signal received through the receiving processor in the external storage medium, and controls the output unit to reproduce the received digital video signal.

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 49.

Yamaji is directed to an audio playback and recording apparatus. Consequently, Yamaji fails to even mention a digital video signal as recited in amended claim 49. Accordingly, the above-claimed features are patentable over Yamaji.

Miyatake sets forth a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12 (see, for example, FIG. 1). However, the video retrieval apparatus illustrated in FIG. 1 of Miyatake does not include "a receiving processor," or "a controller," as recited in claim 49.

The Office Action separately asserts at page 3, lines 11-13, that Miyatake "clearly discloses a connection between the reproducing apparatus and the storage device. Applicant respectfully disagrees because FIG. 2 of Miyatake fails to illustrate either a reproducing apparatus or a storage device. Applicant believes the Office intended to refer to FIG. 1 of Miyatake, rather than FIG. 2, and requests the Office provide confirmation of the same. FIG. 1 of Miyatake illustrates a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12. Thus, FIG. 1 of Miyatake does not illustrate a direct connection between a controller of the display 1 and the external information storage device 12, and consequently display 1 can only display a video signal read from the external information storage device 12 through the computer 2. Accordingly, Miyatake fails to suggest or disclose all of the features recited in amended claim 49.

Kovacevic fails to compensate for the deficiencies of Yamaji and Miyatake.

Accordingly, Applicant respectfully submits that amended independent claim 49 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Further, Applicant respectfully submits that claims 50-63, which depend from independent claim 49, should be allowable for at least the same reasons as claim 49, as well as for the additional features recited therein.

Amended independent claim 1 recites at least the following:

A display apparatus capable of being connected to an external storage medium disposed external to the display apparatus, the display apparatus comprising:

a receiving processor that receives at least one of a digital video signal and an audio signal;

a controller that, if a user commands storage of the received digital video signal and audio signal, stores the received digital video signal and audio signal in the external storage medium by way of a direct connection between the controller and the external storage; and

a port disposed on the display apparatus, through which the received digital video signal and audio signal are transmitted from the display apparatus to the external storage medium.

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 1.

Yamaji is directed to an audio playback and recording apparatus including Controller 21 and External Recording Circuit Section 18. FIG. 7 of Yamaji illustrates that Controller 21 and External Recording Circuit Section 18 are connected via bus and therefore are not directly connected. Consequently, Yamaji fails to describe "a direct connection between the controller and the external storage," as recited in amended claim 1, and the above-claimed features are patentable over Yamaji.

Miyatake sets forth a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12 (see, for example, FIG. 1). Although the display 1 can display a video signal read from the external information storage device through the computer 2, the video retrieval system illustrated in FIG. 1 of Miyatake does not include "a receiving processor," "a controller," or "a port disposed on the display apparatus" as in the above-recited claim. Moreover, the display 2 of Miyatake is connected to the computer 2, rather than being directly connected to the external information storage device 12.

The Office Action separately asserts at page 3, lines 11-13, that Miyatake "clearly discloses a connection between the reproducing apparatus and the storage device. Applicant respectfully disagrees because FIG. 2 of Miyatake fails to illustrate either a reproducing apparatus or a storage device. Applicant believes the Office intended to refer to FIG. 1 of Miyatake, rather than FIG. 2, and requests the Office provide confirmation of the same. FIG. 1 of Miyatake illustrates a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12. Thus, FIG. 1 of Miyatake does not illustrate a direct connection between a controller of the display 1 and the external information storage device 12, and consequently display 1 can only display a video signal read from the external information storage device 12 through the computer 2. Accordingly, Miyatake fails to suggest or disclose all of the features recited in amended claim 1.

Kovacevic fails to compensate for the deficiencies of Yamaji and Miyatake.

Accordingly, Applicant respectfully submits that amended independent claim 1 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Further, Applicant respectfully submits that claims 2-12 and 83-88, which depend from independent claims 1, should be allowable for at least the same reasons as claim 1, as well as for the additional features recited therein.

Amended independent claim 20 recites at least the following:

A display apparatus connected directly with an external storage medium, the apparatus comprising:

a controller that

if the user requires the storage, controls the compression and decompression unit in the compression mode and stores the compressed digital video signal and audio signal compressed by the compression and decompression unit in the external storage medium in real time

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 20.

Yamaji is directed to an audio playback and recording apparatus including Controller 21 and External Recording Circuit Section 18. Further, Yamaji indicates that it is alternatively possible to provide an LCD display controller or an LCD display in place of Controller 21 (col. 12, lines 16-20). FIG. 7 of Yamaji illustrates that Controller 21 and External Recording Circuit Section 18 are connected via bus and therefore are not directly connected. Consequently, Yamaji fails to describe "[a] display apparatus connected directly with an external storage medium" as recited in amended claim 20, and the above-claimed features are patentable over Yamaji.

Miyatake is directed to an apparatus and method for retrieving a video at high speed using a feature of the video as a clue, in lieu of a keyword (par. [0001]). However, Miyatake fails to suggest or disclose a controller that "stores the compressed digital video signal and audio signal compressed by the compression and decompression unit in the external storage medium in real time."

Kovacevic is directed to a system for synchronizing the output of decoded audio data to the presentation of decoded video data (col. 2, lines 1-3). In Kovacevic audio data is transferred to memory and then the stored audio data is read from memory after a delay period, allowing the decoded audio and video data to be output synchronously (col. 2, line 60 – col. 3, line 8).

Kovacevic is silent regarding “real time” storing of data, and consequently fails to describe all of the above-recited features.

Accordingly, Applicant respectfully submits that amended independent claim 20 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Since similar features recited by each of independent claims 13 and 41, with potentially differing scope and breadth, are not taught or disclosed by Yamaji, Miyatake and Kovacevic, the rejection should be withdrawn and claims 13 and 41 also allowed.

Further, Applicant respectfully submits that claims 14-19, 21-29, 42-48 and 79, which variously depend from independent claims 13, 20 and 41, should be allowable for at least the same reasons as claims 13, 20 and 41, as well as for the additional features recited therein.

Amended independent claim 13 recites at least the following:

a controller that forms a virtual file system for the external storage medium, wherein,

if a user requires storage of the received digital video signal and audio signal, the controller stores the received digital video signal and audio signal received through the receiving processor in the external storage medium in real time by way of a direct connection between the controller and the external storage with reference to information generated on the basis of the formed virtual file system,

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 13.

Yamaji illustrates at FIG. 7 that Controller 21 and External Recording Circuit Section 18 are connected via bus and therefore are not directly connected. Consequently, Yamaji fails to describe “a direct connection between the controller and the external storage,” as recited in amended claim 13, and the above-claimed features are patentable over Yamaji.

The Office Action asserts at page 9, lines that Miyatake discusses “wherein the controller forms a virtual file system for the external storage medium and controls the storage or reproduction of the video and/or audio signals with respect to the external storage medium using the virtual file system.” at (pars. [0040] and [0041]). Applicant respectfully disagrees with this assertion.

The cited portions of Miyatake describe a display screen, illustrated in FIG. 4, which may be used to retrieve a portion of a video based on a user's selection of several representative

frames (par. [0041]). However, the cited portions of Miyatake fail to describe “a virtual file system” as recited above. In fact, with regard to target video storage, Miyatake states:

“In accordance with the present invention, the target video is inputted frame by frame successively and stored temporarily in the memory” (par. [0033]).

Here also, Miyatake fails to disclose or suggest “a virtual file system,” as used in the above-recited claim language. Accordingly, Applicant respectfully requests that if any future rejection based on Miyatake is to be asserted, the Office Action provide a specific paragraph number and figure reference, or specifically indicate if an assertion of inherency is being relied upon to disclose the recited features.

Kovacevic fails to compensate for the deficiencies of Yamaji and Miyatake.

Accordingly, Applicant respectfully submits that amended independent claim 13 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Further, Applicant respectfully submits that claims 14-19, which depend from independent claim 13, should be allowable for at least the same reasons as claim 13, as well as for the additional features recited therein.

Amended independent claim 30 recites at least the following:

transmitting the received digital video signal and audio signal to the external storage medium disposed external to the display apparatus by way of a direct connection between the display apparatus and the external storage medium

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 30.

Yamaji is directed to an audio playback and recording apparatus including Controller 21 and External Recording Circuit Section 18. Yamaji further indicates that it is alternatively possible to provide an LCD display controller or an LCD display in place of Controller 21 (col. 12, lines 16-20). FIG. 7 of Yamaji illustrates that Controller 21 and External Recording Circuit Section 18 are connected via bus and therefore are not directly connected. Consequently, Yamaji fails to describe a direct connection between the display apparatus and the external storage medium” as recited in amended claim 30, and the above-claimed features are patentable over Yamaji.

Yamaji is directed to an audio playback and recording apparatus. Consequently, Yamaji is silent regarding "a digital video signal." Accordingly, the above-claimed features are patentable over Yamaji.

Miyatake is directed to a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12 (see FIG. 1). However, the display 2 of Miyatake is connected to the computer 2 rather than being connected to the external information storage device 12. Accordingly, Miyatake fails to suggest or disclose all of the features recited in amended claim 30.

Kovacevic fails to compensate for the deficiencies of Yamaji and Miyatake.

Accordingly, Applicant respectfully submits that amended independent claim 30 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Since similar features recited by independent claims 100, with potentially differing scope and breadth, are not suggested or disclosed by Yamaji, Miyatake and Kovacevic, the rejection should be withdrawn and claim 100 also allowed.

Further, Applicant respectfully submits that claims 31-40, 93-98 and 101-109, which variously depend from independent claims 30 and 100, should be allowable for at least the same reasons as claims 30 and 100, as well as for the additional features recited therein.

Amended independent claim 64 recites at least the following:

A controller for use in a reproducing apparatus which receives a digital video signal and which is directly connected with an external storage medium disposed external to the reproducing apparatus, wherein the controller controls a transmission of the received digital video signal to be stored in the external storage medium, controls a storage of the transmitted digital video signal in the external storage medium, and controls an output unit of the reproducing apparatus to reproduce the received digital video signal.

Yamaji, Miyatake and Kovacevic taken separately or in combination, fail to suggest or disclose at least the above-recited features of amended independent claim 64.

Yamaji is silent with regard to "a digital video signal." Accordingly, the above-claimed features are patentable over Yamaji.

Miyatake illustrates, at FIG. 1, a video retrieval apparatus including a computer 2 located between a display 1 and an external information storage device 12. However, the computer 2,

illustrated in FIG. 1 of Miyatake, is not a controller for use *in* a reproducing apparatus because the computer 2 is illustrated separate and independent of display 1. Accordingly, the video retrieval system illustrated in FIG. 1 of Miyatake does not include "a controller," as recited above.

Kovacevic fails to compensate for the deficiencies of Yamaji and Miyatake.

Accordingly, Applicant respectfully submits that amended independent claim 64 patentably distinguishes over the combination of Yamaji, Miyatake and Kovacevic, and should be allowable for at least the above-mentioned reasons. Further, Applicant respectfully submits that claims 65-77, which depend from independent claim 64, should be allowable for at least the same reasons as claim 64, as well as for the additional features recited therein.

REQUEST FOR ENTRY IN ACCORDANCE WITH 37 CFR 1.116:

Entry of this Amendment in accordance with 37 CFR 1.116 is respectfully requested. Applicant submits that this Amendment After Final Rejection places the subject application in condition for allowance. This Amendment was not presented earlier because Applicant believed that the prior Amendment placed the subject application in condition for allowance. Further, this Amendment should only require a cursory review due to the nature of the claim amendments presented herein. Accordingly, entry of the instant Amendment is respectfully requested.

CONCLUSION:

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

Serial No. 10/785,404

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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